

**PLAINTIFF'S MOTION FOR PARTIAL  
SUMMARY JUDGMENT**

*Pulliam v. County of Fort Bend, Texas, et al.*

Case No. 4:22-cv-4210

**EXHIBIT 21**

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

JUSTIN PULLIAM,

*Plaintiff,*

v.

Civil Action No. 4:22-cv-4210

COUNTY OF FORT BEND, TEXAS;  
SHERIFF ERIC FAGAN, in his  
individual capacity; OFFICER ROBERT  
HARTFIELD, in his individual capacity;  
OFFICER JONATHAN GARCIA, in his  
individual capacity; OFFICER TAYLOR  
ROLLINS, in his individual capacity;  
and OFFICER RICKY RODRIGUEZ, in  
his individual capacity,

*Defendants.*

**DECLARATION OF CHRISTEN MASON HEBERT IN SUPPORT OF  
PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT**

I, Christen Mason Hebert, declare and state as follows:

1. I am a citizen of the United States and a resident of Texas. I am over eighteen years of age and competent to make this declaration. I knowingly and voluntarily submit this declaration in support of Plaintiff's Motion for Partial Summary Judgment based on my personal knowledge of these facts, and I would competently testify to them under oath.

2. I am an attorney with the Institute for Justice, which represents Plaintiff Justin Pulliam in this action.

3. Exhibit 2 to Plaintiff's Motion for Partial Summary Judgment is a true and correct copy of the deposition of Sheriff Eric Fagan.

4. Exhibit 3 to Plaintiff's Motion for Partial Summary Judgment is a true and correct copy of the deposition of Officer Taylor Rollins.

5. Exhibit 4 to Plaintiff's Motion for Partial Summary Judgment is a true and correct copy of the deposition of Officer Ricky Rodriguez.

6. Exhibit 7 to Plaintiff's Motion for Partial Summary Judgment is a true and correct copy of Sheriff Eric Fagan's Responses and Objections to Plaintiff's First Set of Requests for Admission.

7. Exhibit 8 to Plaintiff's Motion for Partial Summary Judgment is a true and correct copy of the deposition of Sheriff Eric Fagan as the 30(b)(6) representative of Fort Bend County.

8. Exhibit 9 to Plaintiff's Motion for Partial Summary Judgment is a true and correct copy of Plaintiff's SD Card Footage, which was produced by Defendants in discovery.

9. Exhibit 10 to Plaintiff's Motion for Partial Summary Judgment is a true and correct copy of Officer Ricky Rodriguez's dashcam recording, which was produced by Defendants in discovery.

10. Exhibit 13 to Plaintiff's Motion for Partial Summary Judgment is a true and correct copy of excerpts from the deposition of Detective Travis James.

11. Exhibit 14 to Plaintiff's Motion for Partial Summary Judgment are true and correct copies of the 2017, 2021, and 2022 versions of General Orders #08-03 (Public Information and Media Relations), which were produced by Defendants in discovery.

12. Exhibit 15 to Plaintiff's Motion for Partial Summary Judgment are true and correct copies of the 2017 and 2021 versions of General Order #05-04 (Social Media and Related Communications), which were produced by Defendants in discovery.

13. Exhibit 16 to Plaintiff's Motion for Partial Summary Judgment is a true and correct copy of the Call Slip secured by Plaintiff Justin Pulliam via an open-records request and used as an exhibit during the deposition of Sheriff Eric Fagan as the 30(b)(6) representative of Fort Bend County.

14. Exhibit 17 to Plaintiff's Motion for Partial Summary Judgment are true and correct copies of Interference Offense Reports, which were produced by Defendants in discovery.

15. Exhibit 18 to Plaintiff's Motion for Partial Summary Judgment is a true and correct copy of Fort Bend County's Responses and Objections to Plaintiff's First Set of Requests for Admission.

16. Exhibit 19 to Plaintiff's Motion for Partial Summary Judgment is a true and correct copy of the deposition of Detective Robert Hartfield.

17. Exhibit 20 to Plaintiff's Motion for Partial Summary Judgment is a true and correct copy of Detective Robert Hartfield's Responses and Objections to Plaintiff's First Set of Requests for Admission.

I declare under penalty of perjury that the foregoing is true and correct and of my own knowledge.

DATED and SIGNED this 4th day of October, 2023.

  
Christen Mason Hebert